

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

VONTERRIOUS HUMBERT, (01),
[DOB: 01/12/2000]

TREMAINE JOHNSON, (02),
[DOB: 11/28/1998]

and

HENRY SIMMONS, (03),
[DOB: 03/06/2000]

Defendants.

Case No. _____

COUNT ONE: ALL DEFENDANTS

Conspiracy to Commit Hobbs Act Robberies

18 U.S.C. § 1951(a)

NMT: 20 Years' Imprisonment

NMT: \$250,000 Fine

NMT: 3 Years' Supervised Release

Class C Felony

COUNT TWO: ALL DEFENDANTS

***Use of a Firearm During and in Relation to a
Crime of Violence***

18 U.S.C. § 924(c)(1)(A)(ii) and 2

NLT: 7 years' Imprisonment

NMT: Life Imprisonment

Consecutive to any other sentence

NMT: \$250,000 Fine

NMT: 5 Years' Supervised Release

Class A Felony

\$100 Mandatory Assessment Each Count

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between on or about November 21, 2018, and November 27, 2018, in the Western District of Missouri, the defendants, **VONTERRIOUS HUMBERT, TREMAINE JOHNSON, and HENRY SIMMONS**, did knowingly and intentionally combine, conspire, confederate, and agree with each other and others to unlawfully obstruct, delay, and affect, and attempt to obstruct, delay and affect commerce as that term is defined in 18 U.S.C. § 1951, and the movement of articles and commodities in such commerce in some way and degree by robbery, as that term is defined in 18 U.S.C. § 1951, in that the defendants did knowingly combine, conspire, confederate, and agree with

each other and others to intentionally and unlawfully take and obtain property, consisting of United States currency from businesses engaged in interstate commerce, and such property was taken against the will of persons employed by such businesses, by means of actual and threatened force, violence, and fear of injury, immediate and future, to each person, that is, the defendants brandished a firearm during demands for property from the employees.

All in violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

Between on or about November 21, 2018, and November 27, 2018, in the Western District of Missouri, the defendants, **VONTERRIOUS HUMBERT, TREMAINE JOHNSON**, and **HENRY SIMMONS**, aiding and abetting each other, did knowingly and intentionally brandish a firearm in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is conspiracy to commit robbery affecting interstate commerce as charged in Count One, all allegations of which are incorporated by reference herein, contrary to the provisions of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

A TRUE BILL.

12/11/18

DATE

/s/ Kathryn Varnon

FOREPERSON OF THE GRAND JURY

/s/ Ashleigh A. Ragner

Ashleigh A. Ragner

Assistant United States Attorney

Narcotics & Violent Crimes, Team One

Western District of Missouri